

14CV1323

THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

PLAINTIFF: Taye Elleby

V.

NEW YORK POST NEWS PAPER

FRANK ROSARIO (REPORTER)

DANIEL PRENDERGAST (REPORTER)

COMPLAINT  
under the  
civil rights act 42 U.S.C.  
(1983)  
JURY TRIAL

NO. \_\_\_\_\_

Between may 9th 2013 and may 11th 2013 frank rosario, and daniel prendergast who were both reporters working for the new york post news paper, these said indivisuals defamed and slandered the plaintiff by way of a massive media network (news paper) BY calling the plaintiff a brute .The words read in big bold letters (Brute busted as E. Harlem pimp) by frank rosario and daniel prendergast on may 11th 2013. The defendants did the defamatory publication, and false allegation with reckless disregard to whether or not the allegations were true . And all the things said herein was done before the plaintiff ever went to appear before a court, judge , or jury.

The defendants made these false allegations on a public level and a massive level as well, being that everyone reads the news paper. The defendants did so with malice, and ill will towards the plaintiff and for the expressed purpose of injuring the plaintiffs good name, reputation , feelings and public standing, exposing him to public ridicule and loss of esteem in the minds of a substantial number of persons/people in his immediate community.

The defendants made these defaming publications working for the new york post news paper, and were employees of the new york post magazin news paper. it should be further noted that the news paper owner or editor had to approve of the article before it went in the news paper

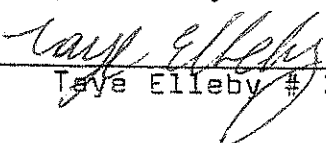
Because these statements defameing publications being put in the news before the plaintiff ever appeared before a judge or court , plaintiff was already labeled and therefore judged, and was deprived of a fair trial, being that the media(defendants) already made a false statement to a massive amount of people that watch the news every day, all over the entire united states, especially in the plaintiffs immediate community. and as a result of the false statements, and defameing publications the plaintiff was deprived of a fair trial , in the end after all damage was done, the plaintiffs 5th, 6th, and 14th amendment rights were violated by the employees of the new york post news paper.

It should be noted that the intent of these words that were printed by the new york post , and reported by frank rosario, and daniel prendergast were understood to mean that the plaintiff was a brute harlem pimp that kidnapped and held women against there will and forced them to prostitute. (see attached article from news paper)

The words that were written with incompetence, larceny, and reckless disregard for the plaintiff, and by the defendants doing all these things they defamed the plaintiff and to a massive amount of people and as a result he was deprived a fair trial, which is a civil rights violation. and the defendants did so knowing the ads would defame the plaintiff.

By reason of the fore going, plaintiff has been damaged in the sum of \$ 10,000,000.00 and demands for relief, indorsement by attorney and verification

Respectfully submitted

  
Tave Elleby # 349-13-07283



## Brute busted as E. Harlem 'pimp'

By FRANK ROSARIO and DANIEL PRENDERGAST

Last Updated: 3:42 AM, May 11, 2013

Posted: 1:51 AM, May 11, 2013

A Manhattan man was busted for allegedly pimping three women — including a 17-year-old Connecticut runaway — out of an East Harlem apartment, cops said yesterday.

Taye Ellerby, 35, advertised the women on Backpage.com and was clearing \$300 a day on each gal, a police source said.

"If they tried to leave, the pimp would hurt them. They got beat up a lot," the source said.

Besides the Connecticut teen, Ellerby also pimped a 21-year-old and a 24-year-old out of an apartment in the Taft Houses on Madison Avenue, cops said.

Ellerby was arrested late Thursday night after a woman who used to work for Ellerby contacted the Connecticut teen's parents, who called 911, cops said.

Neighbors said everyone in the neighborhood knew Ellerby ran a brothel out of the apartment.

"Dudes were just paying for sex in there," said one neighbor.

"He had the girls line up every night. They would be sitting in a couch in the living room. The men who came to the door could take their pick," said neighbor Jeanette Martinez, 48.

"Whenever the girls messed up or did something wrong, you could hear him screaming at them, 'If you ever do that again, I'm going to f--king kill you.' "

Neighbors said Ellerby owned a pit bull.

Man busted for pimping out three women from East Harlem apartment: cops - NYPOST.c... Page 2 of 2

Ellerby was slapped with charges including sex trafficking, promoting prostitution, and endangering the welfare of a child.

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I declare under penalty of perjury that the foregoing is true and correct.

Signed this 21<sup>st</sup> day of Feb, 2014

Signature of Plaintiff Ray E. Ebel  
Inmate Number 3491302283  
Institution Address 11-11 hazen St  
East Elmhurst NY 11370  
(RNDL) C-74  
Rikers Island

**Note:** All plaintiffs named in the caption of the complaint must date and sign the complaint and provide their inmate numbers and addresses.

I declare under penalty of perjury that on this 21 day of February, 2014 I am delivering this complaint to prison authorities to be mailed to the *Pro Se* Office of the United States District Court for the Southern District of New York.

Signature of Plaintiff: Ray E. Ebel